

I.D. 06184818

File No. 3781

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division**

GARDEN CITY BOXING CLUB, INC.,)	
Plaintiff,)	
v.)	07 C 6591
RAYMUNDO RODRIGUEZ, individually and)	
d/b/a MODELO CLUB HOUSE)	
RESTAURANT a/k/a COMIDA TIPICA)	Judge Kendall
MEXICANA and MODELO CLUB HOUSE)	
RESTAURANT a/k/a COMIDA TIPICA)	Magistrate Judge Cox
MEXICANA,)	
Defendant.)	

PLAINTIFF'S MOTION FOR DEFAULT

NOW COME the Plaintiff, GARDEN CITY BOXING CLUB, INC., by and through its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., and respectfully requests that this Court enter an order of default judgment against Defendants, RAYMUNDO RODRIGUEZ, individually and d/b/a MODELO CLUB HOUSE RESTAURANT a/k/a COMIDA TIPICA MEXICANA, and in support thereof, states as follows:

1. On December 18, 2007 RAYMUNDO RODRIGUEZ, individually and d/b/a MODELO CLUB HOUSE RESTAURANT a/k/a COMIDA TIPICA MEXICANA, was personally served with summons and complaint in this matter (*A copy of the Returns of Service is attached hereto as Exhibit "A"*).

2. As of the date of the filing of this motion, Defendant, RAYMUNDO RODRIGUEZ, individually and d/b/a MODELO CLUB HOUSE RESTAURANT a/k/a COMIDA TIPICA MEXICANA, has failed to file an appearance and/or answer in this matter.

WHEREFORE, Plaintiff, GARDEN CITY BOXING CLUB, INC., pray this Honorable Court enter an order of default judgment against Defendant, RAYMUNDO RODRIGUEZ, individually

and d/b/a MODELO CLUB HOUSE RESTAURANT a/k/a COMIDA TIPICA MEXICANA and set this matter for a prove up against Defendant, RAYMUNDO RODRIGUEZ, individually and d/b/a MODELO CLUB HOUSE RESTAURANT a/k/a COMIDA TIPICA MEXICANA and for any additional relief this Court deems just.

s/Zane D. Smith

Zane D. Smith

Zane D. Smith
ZANE D. SMITH & ASSOCIATES, LTD.
415 North LaSalle Street - Suite 300
Chicago, Illinois 60610
(312) 245-0031
(312) 245-0022 - Fax